

Stern, Lavinthal & Frankenberg, LLC

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Attorneys for Secured Creditor,

**Seterus, Inc., as authorized sub-servicer
for Federal National Mortgage Association
("Fannie Mae"), a corporation organized
and existing under the laws of the United
States of America**

By: Jeanette F. Frankenberg, Esq.

Ashley L. Rose, Esq.

In Re:

Thomas Hugh Rondello, Jr.

Josephine Rondello

Debtor(s)

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON VICINAGE

Chapter 13

Case No.: **17-31797-CMG**

Hearing Date:

OBJECTION TO DEBTOR'S MOTION TO APPROVE LOAN MODIFICATION

PLEASE TAKE NOTICE that **Seterus, Inc., as authorized sub-servicer for Federal National Mortgage Association ("Fannie Mae"), a corporation organized and existing under the laws of the United States of America** ("Secured Creditor"), the holder of a mortgage on real property of the debtor(s), by and through its undersigned attorneys, hereby objects to the Motion to Approve Loan Modification on the following grounds:

1. Debtor(s) has been approved for a Trial Loan Modification, wherein Debtor must remit three consecutive payments in the amount of \$1,300.80, beginning on March 1, 2018 through and including May 1, 2018. **Debtor has not yet received a permanent modification.**
2. The Motion should be denied as it is premature in nature. By the trial plan's terms, it requires three (3) timely payments *before* a final modification agreement can be generated and offered to the Debtor. Until the final modification documents have been generated and executed, a motion to approve the same is premature.
3. Given the reasons stated above, Secured Creditor respectfully asserts that the Debtors Motion to Approve Loan Modification should be denied.

I hereby certify that the foregoing statements are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Stern, Lavinthal & Frankenberg, LLC
Attorneys for the Secured Creditor,
**Seterus, Inc., as authorized sub-servicer for
Federal National Mortgage Association
("Fannie Mae"), a corporation organized and
existing under the laws of the United States of
America**

/s/ Jeanette F. Frankenberg, Esq.
Jeanette F. Frankenberg, Esq.

Dated: March 5, 2018

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

In Re:

Case No.: _____

Chapter: _____

Adv. No.: _____

Hearing Date: _____

Judge: _____

CERTIFICATION OF SERVICE

1. I, _____ :

☐ represent _____ in this matter.

☐ am the secretary/paralegal for _____, who represents
_____ in this matter.

☐ am the _____ in this case and am representing myself.

2. On _____, I sent a copy of the following pleadings and/or documents
to the parties listed in the chart below.

3. I certify under penalty of perjury that the above documents were sent using the mode of service
indicated.

Date: _____

Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)